

## REMARKS

Claims 1-24 are pending. Claims 11-16 and 20-22 are allowed. Claims 1, 9, and 23 have been amended. Support for the amendment to claims 1, 9, and 23 is found in paragraphs 167-175 and particularly in paragraph 172 of the application as originally filed. Support is also found in Figures 19C, 19E, and 19F. Claims 1-24 remain for consideration upon entry of the present Amendment. No new matter has been added.

### Examiner's Point 2

Claims 1, 8, 9, 17, and 23 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,392,681 to Wood et al. (hereinafter "Wood").

Wood discloses an apparatus and a method for the alignment of sheet material for printing or performing other work operations thereon. The apparatus supports a sheet material on a worksurface with a selected alignment and performs work operations on the sheet responsive to a controller. The apparatus comprises a workbed that provides the worksurface for supporting the sheet material, a workhead for performing the work operation on the sheet material, means for securing the sheet material to the worksurface, sensing means for sensing an edge of the sheet material, and sheet material translation means for translating the sheet material in the direction of a sheet material translation axis. The method is for the alignment of a sheet material disposed on a worksurface for enhancing printing operations on the sheet material and comprises placing the sheet material over the worksurface, determining the alignment of the sheet material in a coordinate system having first and second axes for specifying locations relative to the worksurface and the sheet material, differentially driving spaced portions of the sheet material for moving the sheet material for providing a selected alignment of the sheet material, providing a pair of translatable sheet material clamps, clamping the sheet material with at least one of the clamps, and differentially translating the first and second ends of the clamps. Variations in the skew can be corrected by correcting the steering, namely, by selectively adjusting actuators to maintain a predetermined skew. The actuators are

coupled to clamp pair fixtures positioned on either side of the apparatus at opposing sides of the worksurface along which the sheet material is moved.

Wood fails to disclose, teach, or suggest means for adjusting angular orientation of a plurality of printing elements of the printhead assembly with respect to a worksurface, the means for adjusting the angular orientation being disposed within the printhead assembly, as is recited in amended claim 1. In contrast, the device disclosed in the Wood patent discloses actuators positioned on either side of the worksurface along which the sheet material is moved. Actuators positioned on either side of the worksurface along which the sheet material is moved, as are disclosed in Wood, are not means that are disposed within a printhead assembly, as is recited in claim 1.

Wood also fails to disclose, teach, or suggest at least one set screw engaging a pin for adjusting angular orientation of printing elements of a printhead assembly with respect to a worksurface, the set screw being disposed within the printhead assembly, as is recited in amended claim 9. In contrast, the device disclosed in the Wood patent discloses actuators positioned on either side of the worksurface along which the sheet material is moved. Actuators positioned on either side of the worksurface along which the sheet material is moved, as are disclosed in Wood, are not set screws disposed within the printhead assembly, as is recited in amended claim 9.

Wood further fails to disclose, teach, or suggest a printer having a printhead assembly including a printhead support structure for removably supporting the printhead assembly, wherein a pin secures the printhead assembly to the printhead support structure, and wherein the pin is fitted through the printhead assembly and engages the printhead support structure, as is recited in claim 17. Moreover, Wood does not disclose, teach, or suggest a cam cooperating with the pin to adjust a position of the printhead with respect to the edge of a strip material. Indeed, Wood makes no mention of a cam throughout the specification and does not show a cam in any of the drawings. Unlike Wood, the present application includes FIGS. 19C, 19E and 19F, which show the cam.

Wood still further fails to disclose, teach, or suggest means for adjusting the angular orientation of printing elements of a printhead assembly with respect to a worksurface, the means for adjusting the angular orientation being disposed within the printhead assembly, as is recited in amended claim 23. As stated above, the device disclosed in the Wood patent discloses actuators positioned on either side of the worksurface along which the sheet material is moved. Actuators positioned on either side of the worksurface along which the sheet material is moved, as are disclosed in Wood, are not means for adjusting the angular orientation being disposed within the printhead assembly, as is recited in amended claim 23.

To anticipate a claim under 35 U.S.C. §102, a single reference must disclose each and every element of the claimed invention. *Lewmar Marine v. Barient Inc.*, 3 USPQ2d 1766 (Fed. Cir. 1987). Absence from the reference of any claimed element negates anticipation. *Kloster Speedsteel AB v. Crucible Inc.*, 793 F.2d 1565 (Fed. Cir. 1986). Because Wood fails to disclose, teach, or suggest means for adjusting angular orientation of a plurality of printing elements of the printhead assembly with respect to a worksurface, the means for adjusting the angular orientation being disposed within the printhead assembly, claim 1 is not anticipated by the Wood reference. Also, because Wood fails to disclose, teach, or suggest at least one set screw engaging a pin for adjusting angular orientation of a printing elements of a printhead assembly with respect to a worksurface, the set screw being disposed within the printhead assembly, claim 9 is not anticipated by Wood. Furthermore, because Wood fails to disclose, teach, or suggest a printer including a cam to adjust a position of a printhead with respect to an edge of a strip material as recited in independent claim 17, claim 17 is not anticipated by Wood. Moreover, because Wood fails to disclose, teach, or suggest means for adjusting the angular orientation of printing elements of a printhead assembly with respect to a worksurface, the means for adjusting the angular orientation being disposed within the printhead assembly, claim 23 is not anticipated by Wood. For at least these reasons, claims 1, 9, 17, and 23 are allowable.

Dependent claims, by definition, further define the subject matter of the independent claims from which they depend. Because claim 8 depends from claim 1, and because claim 1 is believed to be allowable for at least the reasons presented

Application No. 09/900,623  
Amdt. Dated 03/29/04  
Reply to Office Action of 01/29/04

above, claim 8, because it recites subject matter that further defines the subject matter of independent claim 1, is allowable.

Conclusion

Applicants believe that the foregoing amendments and remarks fully comply with the Office Action and that the claims herein are allowable to Applicants. In view of the foregoing points that distinguish Applicants' invention from those of the prior art and render Applicants' invention novel, Applicants respectfully request that the Examiner reconsider the present application, remove the rejections, and allow the application to issue.

If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is invited to telephone the undersigned.

Applicants believe that no fees are due with the submission of this Amendment. If any fees are in fact due with respect to this Amendment, they may be charged to Deposit Account No. 13-0235 maintained by Applicants' attorneys.

Respectfully submitted,

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